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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 13-241 RS
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER GRANTING CONTINUANCE
v.)	AND EXCLUDING TIME UNDER THE
)	SPEEDY TRIAL ACT
ALJANON HENRY,)	
)	Date: May 21, 2013 to July 30, 2013
Defendant.)	Time: 2:30 p.m.

On May 21, 2013, the parties made their initial appearance before the Court. The defense requested a continuance to review discovery. The parties jointly requested that the matter be continued until June 25, 2013 and stipulated that the time between May 21, 2013 and June 25, 2013 be excluded from the running of the speedy trial clock for effective preparation of counsel. The Court granted the continuance and ordered that all time between May 21, 2013 and June 25, 2013 be excluded from the running of the speedy trial clock pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

On June 25, 2013, the parties appeared before the Court for status. Defense counsel notified the Court that additional requests have been made for information from the government. The government is in the process of gathering what additional information there is that may be

responsive to the defendant's request. Defense counsel is also continuing to investigate this matter and requested a continuance until July 30, 2013. The parties stipulated, and the Court ordered that the time between June 25, 2013 and July 30, 2013 shall be excluded from the running of the speedy trial clock for effective preparation of counsel as defense counsel continues to investigate the case. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

SO STIPULATED.

DATED: June 26, 2013.

MELINDA HAAG
United States Attorney

/s/

BENJAMIN TOLKOFF
Assistant United States Attorney

DATED: June 26, 2013.

/s/

EDWARD HU
Attorney for ALJANON HENRY

For the reasons stated this matter is continued until July 30, 2013. All time between May 21, 2013 and July 30, 2013 is excluded from the running of the speedy trial clock. Failure to grant this continuance would deny the defendant effective preparation of counsel and outweighs the best interests of the public in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv). This time was ordered excluded from the running of the speedy trial clock on May 21, 2013 and June 25 2013. This Order serves to supplement and memorialize the Court's oral orders issued on those dates.

SO ORDERED.

DATED: 7/1, 2013.


HONORABLE RICHARD SEEBORG
United States District Court Judge